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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

HILLCREST INVESTMENTS, LTD., a  
foreign corporation,

Plaintiff,

vs.

AMERICAN BORATE COMPANY, a  
California General Partnership,

Defendant.

Case No.: 2:15-cv-01613-RFB-GWF

**STIPULATION TO EXTEND BRIEFING  
DEADLINES REGARDING PLAINTIFF'S  
MOTION FOR LEAVE TO AMEND**

**(FIRST REQUEST)**

Plaintiff Hillcrest Investments, Ltd (“Hillcrest”) and Defendant American Borate Company (“American Borate”), by and through their undersigned counsel of record, do hereby stipulate and agree that the deadlines for briefing on Hillcrest’s Motion for Leave to Amend (the “Motion”) shall be extended as follows: (1) American Borate’s filing of a Response to the Motion shall be extended from April 1, 2016 to April 11, 2016; and (2) Hillcrest’s filing of a Reply in support of its Motion shall be extended from April 8, 2016 to April 20, 2016. The parties have agreed upon this extension because Hillcrest’s Motion raises new legal issues and attaches new legal documents that require American Borate to investigate them before properly responding. American Borate cannot complete this investigation before the current deadline of April 1, 2016.

Pursuant to LR 6-1(b), good cause exists to grant the stipulation and there have be no previous requests asking for an extended briefing deadline regarding the Motion.

Dated: March 31st, 2016

LIZADA LAW FIRM, LTD.

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Investments, Ltd*

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**IT IS SO ORDERED:**



RICHARD F. BOULWARE, II  
United States District Judge

DATED: April 4, 2016.